

EXHIBIT C

Van Tol, Pieter

From: Robert Lippman <rlippman@lemerygreisler.com>
Sent: Sunday, January 28, 2024 8:03 PM
To: Tuxbury, James L.; Van Tol, Pieter
Cc: Bryant, Chris; Bautz, Peter; Fenlon, Christopher V.; Murphy, Kieran T.; Esser, Will; Paul Levine; Peter Damin; Cottrell, Eric H.; thiggs@joneshacker.com; jharwick@joneshacker.com
Subject: RE: Compass v. Prime Capital, et al. -- Order to Show Cause on Stay Motion

[EXTERNAL]

On behalf of the Receiver, we also cannot agree to Opposition papers by Wed., Jan 31st, for the reasons set forth below by Mr. Tuxbury, as well as the fact that the Receiver is actively engaged in marshalling the assets of Defendants and needs to focus his attention, and that of Lemery Greisler LLC, counsel for the Receiver, on this paramount mission rather than having to hurriedly oppose a motion for a stay pending appeal which, respectfully, is unlikely to be granted. WE are willing to agree to Feb. 7th, as proposed below.

Sincerely,
Bob Lippman

From: Tuxbury, James L. <jtuxbury@hinckleyallen.com>
Sent: Sunday, January 28, 2024 6:36 PM
To: Van Tol, Pieter <pieter.vantol@hoganlovells.com>
Cc: Bryant, Chris <chris.bryant@hoganlovells.com>; Bautz, Peter <Peter.Bautz@HoganLovells.com>; Fenlon, Christopher V. <cfenlon@hinckleyallen.com>; Murphy, Kieran T. <KMurphy@hinckleyallen.com>; Esser, Will <willesser@parkerpoe.com>; Paul Levine <plevine@lemerygreisler.com>; Robert Lippman <rlippman@lemerygreisler.com>; Peter Damin <pdamin@lemerygreisler.com>; Cottrell, Eric H. <ericcottrell@parkerpoe.com>; thiggs@joneshacker.com; jharwick@joneshacker.com
Subject: RE: Compass v. Prime Capital, et al. -- Order to Show Cause on Stay Motion

Pieter,

Compass cannot agree that to your proposed scheduling. It is not reasonable. As you know from the bankruptcy hearing last week, counsel for Compass has a conflict the beginning of this week. The parties are also briefing the important disqualification motion. Prime asked for two weeks to respond to the disqualification motion given conflicts, but agreed to nine days for the opposition brief. Compass can agree to the same. If you file a motion by 5:00 PM tomorrow, Compass can agree to a response in nine days, *i.e.*, 5:00 PM on Wednesday February 7.

Further, what bond does Prime propose to file in connection with the proposed stay?

Best,

Jim

James L. Tuxbury

Partner

Hinckley Allen
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jtuxbury@hinckleyallen.com

From: Van Tol, Pieter <pieter.vantol@hoganlovells.com>
Sent: Sunday, January 28, 2024 4:38 PM
To: Fenlon, Christopher V. <cfenlon@hinckleyallen.com>; Tuxbury, James L. <jtuxbury@hinckleyallen.com>; Murphy, Kieran T. <KMurphy@hinckleyallen.com>; Esser, Will <willesser@parkerpoe.com>; Cottrell, Eric H. <ericcottrell@parkerpoe.com>; thiggs@joneshacker.com; jharwick@joneshacker.com; Paul Levine <plevine@lemerygreisler.com>; Robert Lippman <rlippman@lemerygreisler.com>; Peter Damin <pdamin@lemerygreisler.com>
Cc: Bryant, Chris <chris.bryant@hoganlovells.com>; Bautz, Peter <Peter.Bautz@HoganLovells.com>
Subject: Re: Compass v. Prime Capital, et al. -- Order to Show Cause on Stay Motion

EXTERNAL EMAIL

To be clear, the reference below should be to "5:00 pm." Apologies for the typo.

Regards,

Pieter

On Jan 28, 2024, at 11:48 AM, Van Tol, Pieter <pieter.vantol@hoganlovells.com> wrote:

Dear Counsel –

We hereby provide notice, pursuant to N.D.N.Y. Local Rule 7.1(e), that on Monday, January 29, 2024, Defendant Prime Capital Ventures, LLC ("Prime Capital") will file a proposed Order to Show Cause shortening the time for a determination of Prime Capital's accompanying emergency motion for a stay pending appeal of the January 24, 2024 Order appointing the receiver permanently and continuing expedited discovery. We plan to request that any opposition to the emergency motion must be filed by 5:00 on Wednesday, January 31, 2024. We would like to report to the Court that the proposed opposition date is consensual. Please let us know as soon as possible whether you agree.

We will email copies of the proposed order to show cause and supporting papers to you as soon as they are filed.

Regards,

Pieter Van Tol

Partner

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